

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

IN RE:	§	CHAPTER 7
	§	
ROBERT DAVID LAIN	§	CASE NO. 22-40935-MXM7
	§	
DEBTOR	§	

MOTION TO DELAY DISCHARGE TO FILE
REAFFIRMATION AGREEMENTS

TO THE HONORABLE MARK X. MULLIN, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, ROBERT DAVID LAIN, Debtors in the above styled and numbered cause and files this Motion to Delay Discharge for Entering Reaffirmation Agreements pursuant to 28 U.S.C. §1334 and 11 U.S.C. §524 and §727, and pursuant to Bankruptcy Rule 4008(a) and for cause would respectfully show the Court as follows:

I.

Debtors, ROBERT DAVID LAIN filed for relief under Chapter 7 of Title 11 of the United States Bankruptcy Code on 4/27/2022.

II.

Roddrick Breon Newhouse is the Chapter 7 Trustee in this cause.

III.

Debtors would show that the original meeting of creditors was set for 6/1/2022. Debtor would show that the objections to discharge deadline is August 1, 2022. Debtor will need his discharge delayed in order to file reaffirmation agreements before the discharge order is entered.

IV.

Debtor would request the Court to delay the discharge in this case until August 15, 2022.

Respectfully Submitted

/s/ Alice Bower
ALICE BOWER
State Bar No. 15148500
6421 Camp Bowie Blvd., Ste 300
Fort Worth, Texas 76116-2268
(817) 737-5436 Telephone
(817) 737-2970 Fax
alice@alicebower.com
Attorney for Debtor(s)

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion to Delay Discharge to File Reaffirmation Agreements was served upon the creditors in this case by electronic filing, if available, and by First Class United States Mail, if unavailable.

/s/ Alice Bower
ALICE BOWER